

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: : Chapter 11 Case No.
: :
LEHMAN BROTHERS HOLDINGS INC., et al. : 08-13555 (JMP)
: :
Debtors. : (Jointly Administered)

**DECLARATION OF WARREN LUEDECKER IN SUPPORT OF RESPONSE OF
AIG GLOBAL SERVICES INC., F/K/A/ AIG TECHNOLOGIES, INC. TO
PLAN ADMINISTRATOR'S OBJECTION TO CLAIM NO. 66918**

I, Warren A. Luedecker Jr., make this declaration under 29 U.S.C. § 1746, and state:

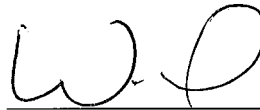
1. I am a Senior Vice President and the General Counsel of AIG Global Services Inc., f/k/a AIG Technologies, Inc. ("AIG Global"), a company incorporated in New Hampshire.
2. I am submitting this Declaration in support of the Response of AIG Global to the Plan Administrator's Objection to Claim of AIG Global Services, Inc. f/k/a AIG Technologies, Inc. (Claim No. 66918) [Docket No. 27615] (the "Objection").
3. On March 31, 2004, AIG Global and Lehman Brothers Holdings Inc. ("Holdings") entered into a License Agreement for Use of Co-Location Space (the "License Agreement"). A true and correct copy of the License Agreement was attached to the Objection. When the License Agreement was agreed, we wanted to be clear that the agreement was simply a license and not a lease because AIG Global did not want to provide Holdings with any real estate tenancy rights.

4. Holdings continued to use the Customer Space¹ after it filed for bankruptcy in September 2008. Holdings did not vacate the Customer Space until on or around May 29, 2010. It removed all Equipment from the Facility at that time.

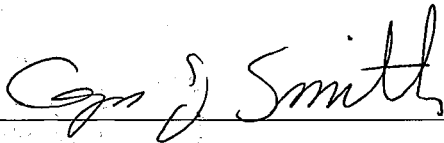
5. Holdings also continued to make payments under the License Agreement after the bankruptcy filing in September 2008. On May 3, 2010, Holdings made a payment under the License Agreement to AIG Global, which covered Holdings's obligations under the License Agreement through that month. Holdings did not make any payments under the License Agreement after that.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Date: New York, New York
May 29, 2012



Warren A. Luedecker Jr.



¹ All capital letters not otherwise defined herein shall have the meanings ascribed to them in the License Agreement.

GEORGE J. SMITH
Notary Public, State of New York
No. 015146017873
Qualified in New York County
Commission Expires Dec. 21, 2014